

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMBROCIO ROJAS, DAVID VALENCIA DE
GABRIEL, and CELESTINO SANCHEZ,
on behalf of themselves and FLSA Collective
Plaintiffs,

Plaintiffs,

v.

VELKONEL RESTAURANT, INC. d/b/a CAFE
31 a/k/a SOUP SPOT, PAUL A VELLIOS, and
CONSTANTINO KELEPESIS,

Defendants.

Case No.: 1:17-cv-6616-VSB

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion to Enforce the Settlement Agreement, and the accompanying Declaration of Anne Seelig, Plaintiffs AMBROCIO ROJAS, DAVID VALENCIA DE GABRIEL, and CELESTINO SANCHEZ will move this Court for an order (1) entering judgment against Defendants VELKONEL RESTAURANT, INC. d/b/a CAFE 31 a/k/a SOUP SPOT, PAUL A VELLIOS, and CONSTANTINO KELEPESIS in the amount of \$40,500, plus a late penalty of 10% in the amount of \$6,916.92, in total of \$47,416.92 due to Defendants' failure to comply with the Court-approved settlement agreement; and (2) awarding Plaintiffs' counsel additional attorneys' fees in the amount of \$2,150 for the time Plaintiffs' counsel has spent in connection with the enforcement of the Agreement.

A proposed order is attached hereto as **Exhibit A**. A proposed judgment is attached hereto as **Exhibit B**.

Dated: March 8, 2021

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ Anne Seelig

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Attorney for Plaintiff